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Refrigeration Industry Health and Welfare  
Trust Fund, Fire and Police Health Care  
Fund, San Antonio, and Plumbers Local  
Union No. 1 Welfare Fund*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

IN RE VALEANT PHARMACEUTICALS  
INTERNATIONAL, INC. THIRD-PARTY  
PAYOR LITIGATION

Civil Action No. 16-3087-(MAS)(LHG)

To: All persons on ECF service list

**PLEASE TAKE NOTICE** that, at such date and time as the Court shall determine, the undersigned counsel for Plaintiffs AirConditioning and Refrigeration Industry Health and Welfare Trust Fund, Fire and Police Health Care Fund, San Antonio, Plumbers Local Union No. 1 Welfare Fund, New York Hotel Trades Council & Hotel Association of New York City, Inc. Health Benefits Fund, and the Detectives Endowment Association of New York City (“Plaintiffs”) will

move the Court, pursuant to Rule 23 of the Federal Rules of Civil Procedure, for an Order Preliminarily Approving Proposed Settlement and Providing for Notice which, among other things, will (i) preliminarily approve the proposed settlement with the Philidor Defendants (the “Philidor Defendants Settlement”); (ii) certify the proposed Settlement Class, certify Plaintiffs as class representatives for the Settlement Class, and appoint Bernstein Litowitz Berger & Grossmann LLP and Carella, Byrne, Cecchi, Olstein, Brody & Agnello, P.C. as Class Counsel, for purposes of settlement only; (iii) approve the form and manner of giving notice of the proposed Philidor Defendants Settlement to Settlement Class Members; and (iv) schedule a hearing to consider final approval of the Philidor Defendants Settlement and approval of the Plan of Allocation and Lead Counsel’s motion for an award of attorneys’ fees and reimbursement of litigation expenses. This motion is unopposed.

The undersigned intend to rely upon the annexed brief. The Stipulation and Agreement of Settlement with the Philidor Defendants and the proposed form of Order Preliminarily Approving Settlement and Providing for Notice and its exhibits are enclosed herewith.

Dated: August 5, 2021

**CARELLA, BYRNE, CECCHI,  
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/s/James E. Cecchi

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